

Rm-9267

Dear FCC

5-25-98

DOCKET FILE COPY ORIGINAL

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MAY 29 1998
FCC MAIL ROOM

Hi I Just Not Know Where To Begain Ok Bout Wanting To Kind
Send In My Comments And Kind Write You Where I Have Read
Where Other Are Trying To Take Our 440 Band Frequency Way
From Us And Thing And Have Seen Where Under The House Bill
HR3572 Where It Was So To Be Designed To Protect The
Ham Band Frequency Ok. Other Are Trying To Kind Take In And
Are Trying To Kind Take Our Ham 440 Band Away From Us And
That Is Not Fair To All The Ham's Today Ok We Have Are Right
To Use Our 440 Band And You Kind Let Them Do That To Us And
They Take Our Ham 440 Band Away From Us That We Have Our
Right To Use And Take On That Is Not Fair To Us Ok. We Take
Our Money And Buy Our Radio To Talk On And Thing You See.
Back In Feb Of 98 I Just Went And Brought My New Daul-Bander
HT Radio For Me To Use And If They Kind Take Our 440 Band
Away From Us Then Our Radio Not Be Any Good To Use You See I
Willing Enjoy Very Much Talking On The 440 Part Of Hamd Band
And The 2 Meter And I Wanting To Please To Write You Ok To
Ask You Please Don't Let All Of Them Other Who Are Trying To
Get Right To Our 440 Part Of Ham Band And Let Them Do It
Please Ok . Befor They Have Pass That Bill HR3572 That Bill
You Remember Back I Not Know When It Was And Thing Ok But If
They Have There Way And Get Our 440 Band Then They Have Broke
That HR3572 Bill To Protect The Ham And That What It Was
Designed For You See. If You Kind Let Them All Who Is Trying
To Take The 440 Band From Us When Our Ham Band Frequency Is
So To Be For Us To Use Then They Have Broke That HR3572 Bill
You See And That Is Not Right And Is Not Fair. I Wanting To
Kind Write You Like All The Other Ham Who Had Write You All
In The Most Week's And Ask You To Not Let Them Other Who Is
Trying To Take Our Ham 440 Band Frequency Away From Us Please
Don't Let Them Kind Do That To Us If You Do Ok That Is Going
To Mess The Whole Part Of 440 Band Up That We Have To Use Ok
Thank You Very Much. David Kelly Call Sign KF4SKS 379
Nolansburg Loop Totz, Ky 40870

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RM 9267

NOCKETE II E MODVADIAIA!

From: Scot Edward Fahey <kd5dgs@dittosrush.com>
To: A4.A4 (SSEGAL)
Date: 5/28/98 10:56pm
Subject: Comments to the Chairman

Scot Edward Fahey (kd5dgs@dittosrush.com) writes:

the request of the LMCC know as RM-9267
would transfer the 70 cm band from Amateur to land mobile use
I strongly oppose the transfer of this limited resource. The repeater network
alone is a national resource,
respectfully
Scot E Fahey KD5DGS

Server protocol: HTTP/1.1
Remote host: 206.96.221.41
Remote IP address: 206.96.221.41

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RM 9267

From: <KF4SZS@aol.com>
To: A4.A4 (FCCINFO)
Date: 5/28/98 12:58pm
Subject: RM-9267 STATEMENT OF OPOSITION

I am writing to oppose the land mobile communications councils proposal to re allocate the 420-430 mhz frequency spectrum to commercial . It will be a great loss for towns and communities like mine that use the frequency for emergencies such as floods and tornado alerts. i am a tech-class amateur radio operator , and a active weather spotter for franklin co. kentucky. I am a member of skywarn as well as a member of the ky. disaster , emergency services . i greatly oppose the re-allocation for these reasons . i also ask that the commision restore amateur radio's historic co-primary status in the entire band 420-450mhz . thank you for your time and cooperation in this matter . KF4SZS Jeffery Allen Barnes
868 east main st. frankfort,ky 40601

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RM 9267

From: "Orv Bennett" <circleb@olympus.net>
To: A7.A7 (WKENNARD, SNESS, MPOWELL, HFURCHTG, GTRISTAN), FC...
Date: 5/29/98 5:22pm
Subject: RM 9267

This is to express my concern regarding the transfer of present Amateur Radio frequencies, 420-450 mhz, to Land Mobile services as requested in RM 9267

These frequencies have been assigned and used by Amateur Radio for many years throughout the country providing a radio link for data transmission by thousands of "Ham" radio operators. These frequencies are important for emergency use because they offer portable, hand-held capability using battery power providing a high degree of flexibility in emergency situations.

Loss of these frequencies would result in a disruption of emergency community services and a waste of equipment already in place.

There is surely a question concerning the need of additional frequencies for Land Mobile services. Their presently assigned frequencies do not appear to be efficiently exploited and the popularity of Cellular phones may actually result in a decline of usage.

Please carefully consider the validity of removing these frequencies assigned to Amateur Radio and reassigning them to a commercial application which may not even need them.

I strongly urge the Commission to deny the RM 9267 petition.

Respectfully;

Orville N. Bennett N7MOZ Port Ludlow, WA.

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RM 9267

From: dragonmaster <dragonmaster@oldkeyr.com>
To: A7.A7 (GTRISTAN, HFURCHTG, MPOWELL, SNESS, WKENNARD) , FC...
Date: 5/29/98 11:00am
Subject: Ref: RM-9267

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the matter of)
)

The Land Mobile Communications Council) RM-9267
Request for Primary Reallocation of the)
420-450 MHz (70 cm band) to the)
Private Mobile Radio Service (PMRS))

Comments in Response to Petition for Rule Making, RM-9267

At present, before the Federal Communications Commission (FCC) is Petition RM- 9267 requesting the reallocations of frequencies in use by Amateur Radio. The facts and information in Petition RM-9267 fails to properly present the true facts available and/or misrepresent information necessary for the FCC to properly review the Land Mobile Communications Council (LMCC) request. I am requesting at this time that the Secretary of the Federal Communications Commission take into considering the following:

1. The Land Mobile Services have not made efficient use of their presently assigned spectrum. There has been little use of narrow bandwidth modulation techniques, such as compandored modulation, digitized techniques, and narrow band FM. As the demand for spectrum needs increases, it is only logical that the FCC mandate more efficient use of existing spectrum rather than hindering other radio services which are making effective use of assigned spectrum. With the increasing use of cellular phone services, the need for transceivers and repeaters for mobile use should be declining rather than increasing as the petitioner suggests.
2. Private Mobile Radio Service (PMRS) would severely restrict Amateur Radio use of these frequencies and greatly hinder, if not eliminate, the public service and emergency communications use of these frequencies by amateur operators. The 70 cm band is very popular among radio amateurs, and plays a critical role in the amateur's ability to provide emergency, public service, and public interest communications.
3. Amateur Radio has demonstrated the ability in providing Emergency Communications in times of disasters, Nationally and locally when other forms of communications were down, not available, or none existent for over 50 years. Amateur Radio Emergency Service (ARES) is and has been in assistance during this time at NO cost to the public and government agencies in times of need. PMRS could NOT replace this service or the communications provided by the very nature of their structure, nor have they presented in RM-9267 a established procedure for the replacement and operational structure that could provide needed

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Emergency Communications as that which already exists with ARES and RACES.

4. One of the five traditional objectives stated by the FCC as a basis and

purpose for the existence of the Amateur Radio Service is, "To provide

emergency or public service communications when normal communications are disrupted." Implementation of this subject proposal would create such a constriction of the 70 cm band, that the FCC would be violating the intent of its own stated purpose.

5. The frequencies used by the Amateur Radio Service were never intended as a pool of frequencies which could be raided at will by other radio services. Amateur operators have millions of dollars invested in equipment to utilize the 70 cm band. This investment was made with the understanding that the FCC would protect the interests of the Amateur Radio Service in the future.

6. In Washington State the K7PP Repeater System provides daily communications North into Canada, East into the States of Idaho and Montana, South into Oregon, and West with Satellite Links into the State of Hawaii. In addition the system provides Emergency Auto Patch direct to over 100 Law Enforcement, Fire, Search & Rescue, and the U.S. Coast Guard dispatchers for over 6,200 registered users. By granting the

LMCC Petition, it would close down this system that relies heavily on the UHF (70 cm) frequencies to provide these services daily and in times of life threatening emergencies.

7. At present, in the United States, the Amateur Radio Service is secondary to military radio location (radar) in the 420-450 MHz band. Originally the

Amateur Radio Service had the primary allocation, but during the 1950s the Cold War made National Security a high priority and the Amateur Radio Service was given a secondary status. The Cold War is now over - it is time to reallocate the Amateur Radio Service as a primary user of the 70 cm band.

Therefore, the FCC has not received full and accurate evidence and facts to grant the Land Mobile Communications Council's request. If a reasonable investigation time is granted with hearings within the affected areas provided for,

I am sure that the FCC would conclude that the request put forth in the Petition submitted my LMCC in RM-9267 is without merit, standing, or within the FCC guideline for the best utilization of frequencies.

Respectfully submitted,

Paul D. Staudt - KC7FTE

May 29, 1998

KC7FTE - Paul D. Staludt
"http://www.oldkeyr.com"
"kc7fte@oldkeyr.com"

Please let me know if you don't get this...

MARKETPLACE AND BUSINESS

RM9267

From: Jerry Seligman <w7bun@wa.net>
To: A7.A7 (GTRISTAN, HFURCHTG, MPOWELL, SNESS, WKENNARD), FC...
Date: 5/29/98 3:48am
Subject: RM-9267

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1. I believe that granting primary status on the 70 cm band to the Private Mobile Radio Service would severely restrict the use of amateur communications for public service and emergency communications.
2. RM-9267, if enacted, would reduce or eliminate signal research for scientific purposes on these frequencies.
3. This band is FULLY utilized in major population centers attesting to its need by the Amateur Radio Service.
4. The various mobile services have made little attempt to reduce the bandwidth (and therefore increase the number of channels available) on their currently assigned frequencies. The Amateur Radio Service continues to implement new techniques for more efficient spectrum usage. RM-9267 would, in effect, punish amateurs by promoting wasteful spectrum usage by the various mobile services.
5. The National Weather Service SKYWARN system, which warns of severe weather in the tornado and hurricane areas of the U. S., would suffer or be eliminated by loss of interference-free frequencies if this proposal is implemented.
6. The FCC has five statements of Basis and Purpose for the existence of the Amateur Radio Service. One statement is, "To provide emergency or public service communications when normal communications are disrupted." Implementing the proposal in RM-9267 violates FCC's own statement, since the disruption of such emergency communications would be disastrous.
7. Amateurs, nationwide, have millions of dollars invested in equipment to utilize the 70 cm band. This investment was made with the expectation and understanding that the FCC would protect the interests of the Amateur Radio Service in the future.
8. The amateur allocation of 420-450 MHz (70 cm) band was made a secondary, shared, allocation due to the needs of the government during the Cold War. The Cold War is over! The Amateur Radio Service should be given a primary status on this band!

Considering the above facts, I STRONGLY URGE the Commission to REJECT the proposal in RM-9267. The LMCC has not proven that their need for this band is greater than the Amateur Radio Service's need, and the FCC should mandate improved narrow bandwidth techniques by all the Land Mobile Service users in their current spectrum allocations.

Respectfully submitted,

G. N. Seligman, W7BUN
12306 80th Ave. East
Puyallup, WA 98373
253-845-7652
e-mail w7bun@wa.net

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RM 9267

From: RICHARD A TEPLY <kc7fli@gte.net>
To: A7.A7 (GTRISTAN, HFURCHTG, MPOWELL, SNESS, WKENNARD), FC...
Date: 5/29/98 1:03am
Subject: RM-9276

Gentleman;

I have only been an amateur radio operator a short time. In that short time I have come to realize that there are countless Amateur organizations through out the Nation and several in our Washington state that are prepared to perform public service communication task in the event of a Natural Disaster or Search and Rescue. These services are at times lifesaving and the community is the benefactor.

Amateur organization in Washington State use the 70-cm band to link two meter repeaters across the state and into adjoining states.

A vote to give the 70-cm band up to Commercial use is a vote against our community and will no doubt cost lives at some time in the future.

I urge you not to relinquish to 70-cm band to the commercial interest.

Richard A Teply
kc7fli

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